

# **EXHIBIT 2**

**Anticipated Class Member Damages:**

1 Year = 250 Shifts (.00003699 of NDA) = **\$698.94**

2 Years = 500 Shifts (.00007398 of NDA) = **\$1,397.88**

3 Years = 750 Shifts (.00011097 of NDA) = **\$2,096.82**

4 Years = 1000 Shifts (.00014796 of NDA) = **\$2,795.76**

5 Years = 1250 Shifts (.00018496 of NDA) = **\$3,494.70**

6 Years = 1500 Shifts (.00022195 of NDA) = **\$4,193.64**

~6.5 Years = 1682 Shifts [the maximum amount for an individual class member] (.00024888 of NDA) = **\$4,702.67**

**Average Number of Shifts Per Class Member:**

460.284 (.00006811 of NDA) = **\$1,286.96**

**Assumptions:**

14,683 Class Members

6,758,356 Shifts (analysis is based on shifts, not workweeks for PAGA)

Time frame for analysis = ~6.5 years

1 year is calculated by assuming 50 weeks worked @ 5 days per week = 250 shifts per year

Net Distribution Amount ("NDA") of \$18,895,333.33

**Analysis for Average Number of Shifts at Average Hourly Rate of \$20.89 (460.284 shifts assuming 1 check per shift)**

	Unpaid Straight Wages	Interest	Total Unpaid Straight Wages and Interest	Liquidated Damages	\$ 203 Penalties	\$ 226(e) Penalties	Total Unpaid Liquidated Damages and Penalties	Maximum Hypothetica l Monetary Recovery	Maximum Hypothetical Damages Without Liquidated Damages and Penalties	Anticipated Settlement Damages
1 Minute	\$160.22	\$124.17	\$284.39	\$63.65	\$626.70	\$4,000	\$4,690.35	\$4,974.39	\$284.30	\$1,286.96
5 minutes	\$801.13	\$620.88	\$1,422.01	\$316.77	\$626.70	\$4,000	\$4,943.47	\$6,365.01	\$1,422.01	\$1,286.96
10 Minutes	\$1,602.26	\$1,241.75	\$2,844.01	\$633.54	\$626.70	\$4,000	\$5,260.24	\$8,104.01	\$2,844.01	\$1,286.96

**Analysis for Average Number of Shifts at Average Minimum Wage Rate of \$8.26 (460.284 shifts assuming 1 check per shift)**

	Unpaid Straight Wages	Interest	Total Unpaid Straight Wages and Interest	Liquidated Damages	\$ 203 Penalties	\$ 226(e) Penalties	Total Unpaid Liquidated Damages and Penalties	Maximum Hypothetica l Monetary Recovery	Maximum Hypothetical Damages Without Penalties	Anticipated Settlement Damages
1 Minute	\$63.35	\$49.10	\$112.45	\$63.65	\$626.70	\$4,000	\$4,690.35	\$4,802.45	\$176.10	\$1,286.96
5 minutes	\$316.77	\$245.50	\$562.27	\$316.77	\$626.70	\$4,000	\$4,943.47	\$5,505.27	\$879.04	\$1,286.96
10 Minutes	\$633.54	\$490.99	\$1,124.53	\$633.54	\$626.70	\$4,000	\$5,260.24	\$6,384.77	\$1,287.92	\$1,286.96

**Key:**

10% simple interest calculated from 2/1/14 through 11/1/21 (starting 92 weeks prior to the discontinuance of the security  
check policy in December 2015 for a total of 93 months)

Anticipated Net Distribution Amount of \$18,895,333.33

14,683 Class Members

All unpaid base wages are for straight time hours worked

Employees worked 5 days per week, so 460.284 shifts/5 days = 92.05 weeks